

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

BLUEPRINT CAPITAL ADVISORS, LLC,

Plaintiff,

v.

STATE OF NEW JERSEY, *et al.*,

Defendants

Case No. 2:25-cv-01995-JXN-MAH

**NOTICE OF JOINT MOTION TO FILE  
UNDER SEAL**

Underlying Action: Case No. 2:20-cv-07663-  
JXN-MAH

**PLEASE TAKE NOTICE** that, as soon as counsel may be heard, the undersigned parties shall move before the Honorable Michael A. Hammer, U.S.M.J., at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom MLK 2C, for the entry of an Order pursuant to the Discovery Confidentiality Order entered by this Court (Underlying Action Dkt. 241) and Local Civil Rule 5.3(c) to seal Exhibit A, Exhibit B, and portions of Plaintiff's Letter Brief In Further Support of Motion to Compel Doug Ostrover and Alan Kirshenbaum to Comply With Subpoenas, dated April 14, 2025 (Dkt. 21), and Exhibit II to third-parties Doug Ostrover's and Alan Kirshenbaum's Letter Opposition, dated April 28, 2025 (Dkt. 23-2).

**PLEASE TAKE FURTHER NOTICE** that a proposed Order granting the relief requested is submitted herewith.

Dated: May 12, 2025

Respectfully submitted,

**BROWN RUDNICK LLP**

By: /s/ Lauren Tabaksblat

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